

SCANNED ORIGINAL

Andrew B. Messite (ABM-3748)
REED SMITH LLP
599 Lexington Avenue
New York, New York 10022
Telephone (212) 521-5445

Attorneys for Defendant Bank of America, N.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NANCY PASCAL, individually and on
behalf of a class,

Plaintiff,

v.

ALLAN P. FEIGELSON, individually and doing
business as ALLAN P. FEIGELSON, : A
a dissolved corporation, and BANK OF AMERICA,
N.A.,

Defendants.

08 CV 0550 (SCR)

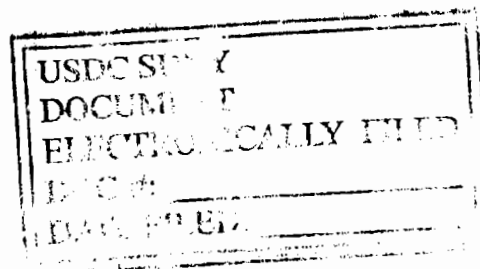
NOTICE OF MOTION

S.D. OF N.Y.

FILED
U.S. DISTRICT COURT
MAR 26 PM 2:55

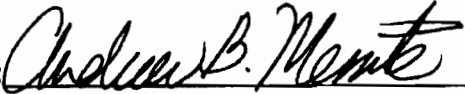
PLEASE TAKE NOTICE that upon the accompanying affidavits of Andrew B. Messite, sworn March 19, 2008 and Dianna C. Wyrick sworn to March 20, 2008 and the exhibits annexed thereto, and upon all prior proceedings had herein, defendants Bank of America, N.A. will move this Court, Hon. Stephen C. Robinson at the United States Courthouse, 300 Quarropas St., White Plains, NY 10601, at a date and time to be designated by the Court, for an Order, pursuant to Local Civil Rule 1.3(c), admitting Dianna C. Wyrick to the bar of this Court, pro hac vice, solely for the purpose of representing defendant Bank of America, N.A. in connection with the above-captioned action, and for such other and further relief as this Court deems proper.

Dated: New York, New York
March 20, 2008



MAR 26 2008
208-550-526-20

REED SMITH LLP

By: 

Andrew B. Messite (ABM-3748)

599 Lexington Avenue

New York, New York 10022

Tel. (212) 521-5445

Fax (212) 521-5450

amessite@reedsmith.com

*Counsel for Defendant
Bank of America, N.A.*

To:

Abraham Kleinman

Kleinman LLC

626 Rex Corp Plaza

Uniondale, NY 11556-0626

akleinman@solve360.com

Cathleen M. Combs

Edelman, Combs, Lattuner & Goodwin, LLC

120 S. LaSalle Street

Suite 1800

Chicago, IL 60603

ccombs@edcombs.com

Counsel for Plaintiff Nancy Pascal

Jamie Rebecca Wozman

Shelowitz Broder LLP

11 Penn Plaza, 5th Floor

New York, NY 10001

wozmanj@wemed.com

Mark K. Anesh

Wilson, Elser, Moskowitz, Edelman & Dicker LLP

150 East 42nd Street

New York, NY 10017-5639

Counsel for Allan P. Feigelson and Allan P. Feigelson, P.A.

ORIGINAL

Andrew B. Messite (ABM-3748)
REED SMITH LLP
599 Lexington Avenue
New York, New York 10022
Telephone (212) 521-5445

Attorneys for Defendants Bank of America, N.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NANCY PASCAL, individually and on
behalf of a class,

Plaintiff,

v.

ALLAN P. FEIGELSON, individually and doing
business as ALLAN P. FEIGELSON, P.A.,
a dissolved corporation, and BANK OF AMERICA,
N.A.,

Defendants.

Case No. 08 CV 0550 (SCR)

**AFFIDAVIT OF ANDREW
B. MESSITE IN SUPPORT
OF MOTION TO ADMIT
COUNSEL
PRO HAC VICE**

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

Andrew B. Messite, being duly sworn, hereby deposes and says as follows:

1. I am a member of Reed Smith LLP, counsel for Defendant Bank of America, N.A. in connection with the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of my motion to admit Dianna C. Wyrick as counsel *pro hac vice* to represent Defendant Bank of America, N.A.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1990. I am also admitted to the bar of the United States District Courts for the Southern and Eastern Districts of New York, and am in good standing in each Court.

3. Ms. Wyrick is a member of Reed Smith LLP, in Pittsburgh, Pennsylvania.

4. I have found Ms. Wyrick to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure and the Local Rules of this Court.

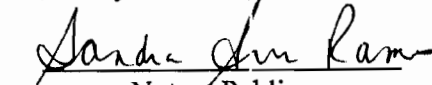
5. Accordingly, I am pleased to move the admission of Dianna C. Wyrick.

6. I respectfully submit a proposed order granting the admission of Dianna C. Wyrick, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Dianna C. Wyrick, *pro hac vice*, to represent Defendant Bank of America, N.A. in the above-captioned matter, be granted.

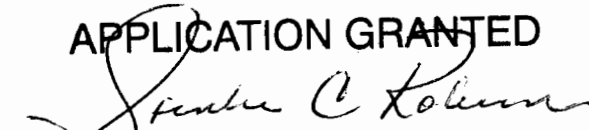

ANDREW B. MESSITE (ABM-3748)

Sworn to before me this
19th day of March, 2008.


Notary Public

SANDRA ANCHUNDIA-RAMOS
Notary Public, State of New York
No. 31-4919484
Qualified in Queens County
Commission Expires February 16, 20 10

APPLICATION GRANTED


HON. STEPHEN C. ROBINSON